



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 12 1996

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

**MEMORANDUM**

**SUBJECT:** National Remedy Review Board Recommendations on the Shipyard Sediments Superfund Site

**FROM:** Bruce K. Means, Chair *BK Means*  
National Remedy Review Board

**TO:** Randy Smith Director  
Environmental Cleanup Office (ECL-113)  
EPA Region 10

**Purpose**

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Shipyard Sediments Operable Unit of the Harbor Island Superfund site in Seattle, Washington. This memorandum documents the NRRB's advisory recommendations.

**Context for NRRB Review**

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost (and thus potentially controversial) proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional,

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State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

### **NRRB Advisory Recommendations**

The NRRB reviewed the site package for the Harbor Island, Shipyard Sediments site, as well as submissions provided on behalf of the potentially responsible parties (PRPs). The Board discussed this information with Washington State Department of Ecology sediments expert Theresa Michelsen, EPA RPM Keith Rose, and EPA Region 10 sediments expert John Malek on August 14th, 1996. Based on this review and discussion, the NRRB agrees that the ecological risks posed by the sediments at the Todd and Lockheed Martin shipyards substantiate the need for remedial action. In addition, the NRRB makes the following observations.

- The Board supports dredging as the appropriate response, given the high levels of contamination, and believes that capping alone (Alternative 2) provides less long term effectiveness than does dredging. Capping alone would also conflict with the current and future use of the Todd shipyard.
- The NRRB does not have enough information to evaluate the relative cost-effectiveness of Alternatives 3 and 4. Several variables could significantly affect the costs of these alternatives, including:
  - the lack of information about the implementability, feasibility (and cost) of under pier dredging;
  - uncertainty about the availability and location of aquatic disposal and/or upland disposal sites;
  - the uncertainty in the volumes of dredged material to be disposed.

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- The Board recommends that the Region clarify how the combination of dredging and capping in Alternative 4 is intended to achieve the remedial action objectives, in order to establish the performance standards for each.

The NRRB appreciates the Region's efforts to work closely with the State, local government and community to identify the current proposed remedy. The Board members also express their appreciation to both the Region and the State of Washington for their participation in the review process. We encourage Region 10 management and staff to work with their Regional NRRB representative and the Region 4/10 Accelerated Response Center at Headquarters to discuss appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: C. Clarke  
S. Luftig  
E. Laws  
T. Fields  
J. Cunningham  
B. Breen

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